

EXECUTIVE SUMMARY

The Plan for Prevention of Contaminant Dispersion (PPCD) is a "primary document" specified under the Interagency Agreement (IAG) between the Environmental Protection Agency (EPA), the Colorado Department of Health (CDH), and the Department of Energy (DOE) Rocky Flats Operations.

The technical scope of work as presented in the IAG has two primary functions: (1) The PPCD shall provide a management plan to prevent airborne transport of hazardous or dangerous materials; and (2) The PPCD shall include a proposal to evaluate the potential for and risk of windblown contaminants from the Rocky Flats Plant (RFP).

The applicability of the PPCD to intrusive field activities conducted as part of a RCRA Facility Investigation/Remedial Investigation (RFI/RI) or Interim Remedial Action (IM/IRA) consists of four key components: (1) establishment of soil threshold levels, (2) assessment/selection of preventive measures, (3) establishment of a monitoring plan, and (4) development of an implementation plan.

The PPCD presents criteria for designating intrusive RFI/RI or IM/IRA activities at site locations as Stage 1 or Stage 2. Risk-based soil thresholds for contaminants are derived as a function of activity to be conducted and distance from the site boundary. The application of these soil thresholds is based on public protection criteria; however, implementation of the required control measures and airborne monitoring will ensure that the workers are protected as well.

Activities conducted under Stage 1 are performed at site locations which have soil data indicating contaminant concentrations do not exceed the established soil thresholds. The Stage 1 contaminant dispersion control measures will include the following: establishing wind speed thresholds, water spray soil applications, waste pile covering, and general administrative control measures such as vehicular speed limitations. The effectiveness of

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such controls will be measured by occupational health and safety real-time particulate and vapor monitors, soil moisture gauges, and anemometers.

Activities conducted under Stage 2 are performed at locations where RFI/RI intrusive activities such as IM/IRAs will require additional preventive measures and airborne contaminant monitoring. The Stage 2 dispersion control measures will consist of Stage 1 methods plus additional suppression techniques such as extensive wetting, wind screens, spray curtains or paving. The selection of any particular technique will depend on the activity performed and the effectiveness and/or implementability of the technique under consideration. In addition to real time monitoring, air sampling provides an integrating record of the dust concentrations during the work activities.

Site-specific implementation plans and monitoring programs will be developed to verify proper execution and effectiveness of the control measures applied. Work will cease when the monitoring indicates unacceptable airborne concentrations of contaminants. Work will only resume these concentrations have been reduced to acceptable levels.

The PPCD has been developed through a working committee consisting of representatives from EPA, CDH, DOE, and EG&G. The technical approach and compliance measures that form the basis of this document were jointly discussed through a series of working group sessions.